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Attorneys for JS Products, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

JS PRODUCTS, INC., a Nevada corporation,

Plaintiff,

v.

ROLLER CLUTCH TOOLS, LLC, a
California limited liability company,

Defendant.

Case No.: 2:17-cv-02615-JAD-GWF

**STIPULATION REGARDING
EXTENSION OF TIME TO RESPOND TO
THE COMPLAINT AND TO RESPOND
TO MOTION TO ENJOIN ROLLER
CLUTCH TOOLS, LLC FROM
PROSECUTING ITS CASE AGAINST
DEFENDANT BEFORE THE UNITED
STATES DISTRICT COURT OF THE
EASTERN DISTRICT OF TEXAS**

(First Request)

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1 Pursuant to Fed. R. Civ. P. 6(b)(1)(a), Local Rules 6-1 and 6-2, Defendant Roller
2 Clutch Tools, LLC (“Roller Clutch” or “Defendant”) has requested, and Plaintiff JS Products,
3 Inc.’s (“JS Products” or “Plaintiff”) has agreed to, a thirty (30) day extension of time, until
4 **December 1, 2017**, in which to file its response to Plaintiff’s Complaint for Declaratory
5 Judgment and Injunctive Relief, (ECF No. 1) (the “Complaint”). Defendant’s response is
6 currently due November 1, 2017.

7 Defendant has also requested, and Plaintiff has agreed to, a thirty (30) day extension of
8 time, until **December 4, 2017**, in which to file its response to Plaintiff’s Motion to Enjoin
9 Roller Clutch Tools, LLC From Prosecuting its Case Against Lowe’s Home Centers, LLC
10 Before the United States District Court for the Eastern District of Texas (ECF No. 7) (the
11 “Motion”). Defendant’s response is currently due November 3, 2017.

12 Plaintiff has agreed to Defendant’s requests, based on Defendant’s stipulation that it
13 will not argue that litigation filed in the United States District Court for the Eastern District of
14 Texas styled *Roller Clutch Tools, LLC v. Lowe’s Home Centers, LLC*, C.A. No. 2:17-cv-
15 00556-JRG, is further advanced than this litigation due to the Court’s granting of these
16 extensions of time, or due to activities initiated by Roller Clutch during the time period of the
17 extension. Good cause otherwise exists for this Court to grant the extension, the first
18 requested in this case by either party, because it allows Defendant to obtain required Nevada
19 counsel.

20 Plaintiff hereby stipulates that Defendant has until **December 1, 2017** to file its
21 response to the Complaint, and until **December 4, 2017** to file its response to the Motion.
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Dated: November 1, 2017

MCDONALD CARANO LLP

/s/ Craig A. Newby

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Roller Clutch Tools, LLC**

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ORDER

IT IS SO ORDERED this 2nd day of November, 2017.


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on November 1, 2017, I caused a true and correct copy of the foregoing **STIPULATION REGARDING EXTENSION OF TIME TO RESPOND TO THE COMPLAINT AND TO RESPOND TO MOTION TO ENJOIN ROLLER CLUTCH TOOLS, LLC FROM PROSECUTING ITS CASE AGAINST DEFENDANT BEFORE THE UNITED STATES DISTRICT COURT OF THE EASTERN DISTRICT OF TEXAS**, to be served via the U.S. District Court's Notice of Electronic Filing ("NEF") in the above-captioned case to:

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/s/ Brian Grubb
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